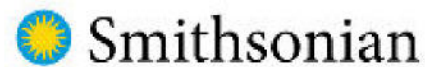


OFFICE OF THE INSPECTOR GENERAL



Opportunities Exist to Further Strengthen Smithsonian's Content Review Process



Smithsonian Institution Building
(The Castle)

OIG-E-26-01
JUNE 30, 2026

In Brief

Opportunities Exist to Further Strengthen Smithsonian's Content Review Process

OIG-E-26-01, June 30, 2026

Background

The Smithsonian Institution (Smithsonian) serves as the collective memory of the nation's history, therefore the content exhibited is of high public interest. Between November 2024 and August 2025, one of the exhibitions, *Making Home-Smithsonian Design Triennial* at Cooper Hewitt, Smithsonian Design Museum (Cooper Hewitt), featured an installation titled *Patterns of Life*. This installation received heightened public attention with more than 2,600 complaints regarding its content on homes in Iraq, Syria, and Palestine destroyed by US-manufactured weapons.

Smithsonian Directive (SD) 603, *Exhibition, Program Planning, Research, and Educational Content* governs the Smithsonian's content review process, with specific focus on potentially sensitive topics. The policy was established as a mechanism for broader review of proposed exhibitions, program planning, research, and educational content, striving for balanced perspectives within the content while preserving creative independence.

What OIG Did

OIG selected the *Patterns of Life* exhibit as a case study of the Smithsonian's content review process.

This evaluation (1) determined the extent to which Cooper Hewitt followed Smithsonian's content review policy when developing *Patterns of Life* and (2) identified opportunities to strengthen the content review process.

What OIG Found

Cooper Hewitt generally followed the Smithsonian's content review process for *Patterns of Life*. However, OIG identified opportunities to further strengthen this process.

The SD 603 Committee's authority, role, and procedures for reviewing sensitive content have not been formalized. Despite its role in reviewing sensitive exhibit content, the SD 603 Committee is not formally named or structured within SD 603 to define its purpose, responsibilities, and authority. The committee also lacks procedures describing how reviews should be conducted and resources to support the review process. As a result, committee members and units are uncertain of their roles and responsibilities and how to effectively review content.

The Smithsonian has taken steps to strengthen the content review process, but improvements are needed to clarify requirements and expectations. The Smithsonian revised SD 603 in June 2025 and developed a learning series and resources for all personnel. However, more is needed to prepare staff for content reviews. Additional improvements include clarifying expectations around (1) content review timing and documentation, (2) formal unit exhibition planning guidelines, (3) obtaining diverse perspectives, and (4) contracts for exhibition content.

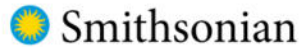
OIG questioned \$36,500 in American Women's History Initiative pool funds used for *Patterns of Life*. While reviewing documentation on the development of *Patterns of Life*, OIG examined proposals for federal funds and identified \$36,500 in questioned costs. Specifically, Cooper Hewitt used federal funds from the American Women's History Initiative pool without notifying fund administrators that the exhibit no longer had the nexus to American women's history as initially proposed.

What OIG Recommended

OIG made seven recommendations to strengthen Smithsonian's content review process. Management concurred with six recommendations and non-concurred with one recommendation to require periodic training for Smithsonian personnel involved in content development and track completion of the training.

**OFFICE OF THE
INSPECTOR GENERAL**

Memo



Date: June 30, 2026

To: Kevin Gover, Under Secretary for Museums and Culture
Maria Nicanor, Director, Cooper Hewitt Smithsonian Design Museum

Cc: Carol LeBlanc, Acting Deputy Secretary and Chief Operating Officer
Ron Cortez, Under Secretary for Finance and Administration
Ellen Stofan, Under Secretary for Science and Research
Monique Chism, Under Secretary for Education
Greg Bettwy, Chief of Staff, Office of the Secretary
Jennifer McIntyre, Chief Legal Officer, Office of the General Counsel
Porter N. Wilkinson, Chief of Staff to the Regents, Office of the Regents
Melanie Adams, Interim Director, Smithsonian American Women's History Museum

From: Nicole L. Angarella, Inspector General  Signed by:
Nicole Angarella
6E3A9C42718646B...

Subject: Opportunities Exist to Further Strengthen Smithsonian's Content Review Process (OIG-E-26-01)

This memorandum transmits our final evaluation report on the Smithsonian's content review process. The objectives of this evaluation were to (1) determine the extent to which Cooper Hewitt followed the Smithsonian Institution's content review policy when developing the *Patterns of Life* exhibit and (2) identify opportunities to strengthen the content review process.

We made seven recommendations for Smithsonian management to strengthen the content review process. Management concurred with six recommendations and did not concur with one recommendation related to requiring periodic training for Smithsonian personnel involved in content development and tracking completion of the training.

We appreciate the courtesy and cooperation of all Smithsonian management and staff during this evaluation. If you have any questions, please contact me or Joan Mockeridge, Assistant Inspector General for Audits, Inspections, and Evaluations.

Table of Contents

INTRODUCTION.....	3
BACKGROUND	4
RESULTS OF EVALUATION.....	8
<i>Cooper Hewitt Generally Followed the Content Review Process for Patterns of Life</i>	8
<i>The SD 603 Committee’s Authority, Role, and Procedures for Reviewing Sensitive Content Has Not Been Formalized</i>	9
Lack of Committee Structure and Processes	10
Mandatory versus Advisory	10
Limited Documentation of Committee Meetings and Recommendations	11
Timeframes for Review of Content Material and Committee Meeting Discussions are Inadequate	11
<i>Smithsonian Has Taken Steps to Strengthen the Content Review Process, but Improvements Are Needed to Clarify Requirements and Expectations</i>	12
Smithsonian Developed Staff Training and Resources but More is Needed to Prepare Staff for Content Reviews	12
Formal Unit Exhibition Planning Guidelines Are Not Enforced	14
Revised SD 603 Requires Units to Obtain Diverse Perspectives but Does Not Provide Related Implementation Guidance	14
Guidance on Contractual Language for User-Generated Exhibition Content is Limited	15
<i>OIG Questions \$36,500 in American Women’s History Initiative Pool Funds Used for Patterns of Life</i>	16
CONCLUSIONS	17
RECOMMENDATIONS	17
MANAGEMENT COMMENTS AND OIG RESPONSE	18
Appendix I: Objective, Scope, and Methodology.....	19
Appendix II: Key Updates to Smithsonian Directive 603 in June 2025	20
Appendix III: Cooper Hewitt Triennial Exhibition Development Phases.....	21
Appendix IV: SD 603 Committee Members	22
Appendix V: Management Comments.....	23

Figures

Figure 1. <i>Patterns of Life</i> as Displayed at Cooper Hewitt, Smithsonian Design Museum.....	6
Figure 2. <i>Patterns of Life</i> as Displayed at Cooper Hewitt, Smithsonian Design Museum.....	7
Figure 3. Cooper Hewitt Trigger Warning.....	9
Figure 4. Smithsonian Content Review Training Schedule.....	13
Figure 5. <i>A Street In A Room</i> Concept in July 2023	16

Abbreviations

AWHIP	American Women’s History Initiative Pool
Cooper Hewitt	Cooper Hewitt, Smithsonian Design Museum
Making Home	Making Home-Smithsonian Design Triennial
OCEA	Office of Communications and External Affairs
OIG	Office of the Inspector General
OUSMC	Office of the Under Secretary for Museums and Culture
SD	Smithsonian Directive
Smithsonian	Smithsonian Institution
USMC	Under Secretary for Museums and Culture
US	United States

INTRODUCTION

The Smithsonian Institution (Smithsonian) serves as the collective memory of the nation's history, therefore the content exhibited is of high public interest. In 2025, the Smithsonian received 14.9 million visitors across 17 museums and the National Zoo, showcasing 227 exhibitions spanning history, science, research, and the arts.¹ One of the exhibitions, *Making Home-Smithsonian Design Triennial (Making Home)* at Cooper Hewitt, Smithsonian Design Museum (Cooper Hewitt), featured an installation titled *Patterns of Life*. From November 2024 to August 2025, *Patterns of Life* received heightened public attention with an email campaign of more than 2,600 complaints regarding the installation's content, which featured homes in Iraq, Syria, and Palestine destroyed by weapons manufactured in the United States (US). Cooper Hewitt's curatorial team stated *Patterns of Life* was intended to illuminate the complex roles of the United States as both the leading financial contributor to United Nations peacekeeping initiatives and the world's largest producer of arms. However, the complaints expressed concerns that the exhibit provided a national platform for political activism, lacked balance of perspectives, and editorially omitted broader context.

Smithsonian Directive (SD) 603, *Exhibition, Program Planning, Research, and Educational Content* governs the Smithsonian's content review process, with specific focus on potentially sensitive topics. The Smithsonian established SD 603 as a mechanism for broader review of proposed exhibitions, program planning, research, and educational content, striving for balanced perspectives within the content while preserving creative independence. The SD 603 dated October 2021 was in effect at the time *Patterns of Life* was developed and reviewed; Smithsonian issued a revised SD 603 in June 2025 which expanded definitions and clarified language, particularly for content and consultations.

Independent from the SD 603 process, in March 2025, the President of the United States issued an executive order announcing a review of exhibit content it deemed "ideological indoctrination or divisive narratives", which led to requests for content-related information from multiple Smithsonian museums.² Further, the Smithsonian Board of Regents called for its own internal study on Smithsonian content in June 2025.³

The objectives of this evaluation were to (1) determine the extent to which Cooper Hewitt followed the Smithsonian Institution's content review policy when developing the *Patterns of Life* exhibit and (2) identify opportunities to strengthen the content review process.

The Office of the Inspector General (OIG) selected the *Patterns of Life* exhibit as a case study of the Smithsonian's content review process. The case study included assessing whether Cooper Hewitt complied with the content review policy, what changes the Smithsonian made to its content review policies and practices, and whether additional opportunities exist to strengthen

¹ Smithsonian's 2025 visitor statistics did not include the Smithsonian Institution Building, the Smithsonian Gardens, the Smithsonian American Women's History Museum, and the National Museum of the American Latino.

² As of February 27, 2026, these requests have not included content-related information from Cooper Hewitt.

³ As of January 2026, the Smithsonian has completed two of the three phases of the internal study.

the policies and processes. OIG conducted its assessment through interviews with Cooper Hewitt and Smithsonian officials, review of procedural documents, and a site visit to the exhibit.

For a detailed description of OIG’s objective, scope, and methodology, see Appendix I.

OIG conducted this evaluation in Washington, D.C. and New York City from July 2025 to May 2026, in accordance with the Council of the Inspectors General on Integrity and Efficiency’s Quality Standards for Inspection and Evaluation.

BACKGROUND

Smithsonian Content Review Process

The Smithsonian reviewed the content for *Patterns of Life* under the October 2021 version of SD 603, the objectives of which included offering general guidance for identifying and managing sensitive issues and for anticipating and responding to potential strong public reaction, negative media attention, or other significant scrutiny. The policy defined a sensitive issue as follows:

Issue about which stakeholders and/or the public may disagree on substantive grounds with the presentation or contents of an exhibition, public program, research activity, and educational content.

The SD 603 policy outlined the roles and responsibilities of unit directors to establish guidelines for developing exhibitions and mechanisms for identifying sensitive issues and operational risks, among other things. When units identify sensitive or potentially sensitive issues or operational risks, the policy called for unit directors to notify the appropriate secretarial direct report with ample time to discuss and determine whether a formal review is required. The Under Secretary for Museums and Culture (USMC) is to convene formal and informal reviews with the Secretary who has final authority to approve or disapprove any Smithsonian content.

In June 2025, the Smithsonian issued a revised SD 603. Efforts to amend the policy began in January 2024, after the Secretary established the Public Trust Committee to ensure the Smithsonian was taking proper steps to understand audiences, improve routines and processes, help address challenges related to content development and audience engagement, and expand effective application of SD 603 across the Smithsonian. The revised SD outlines similar roles and responsibilities but expands definitions and clarifies language, particularly for content and consultations. For example, the revision expands the prior definition of “sensitive issue” (**new language is bolded**):

Sensitive, **Controversial, or Politicized** Issue – Issue about which stakeholders and/or the public may disagree on substantive grounds with the presentation or contents of an exhibition, public program, research activity, and educational content. **This may also include partisan battles on particular topics and/or the potential for reasonable viewers to find the content offensive.**

The June 2025 revision also states that “content must be non-partisan” and that in formal and informal reviews, the USMC “exercises the Secretary’s authority to approve, disapprove, or require changes to any Smithsonian content”. For further detail on the changes, see Appendix II.

Although not required in the SD 603 policy, a committee of senior Smithsonian officials conducts formal reviews led by the Under Secretary for Museums and Culture. These reviews typically involve presentations by the exhibiting units and discussion around the appropriateness of content and its balanced representation.

Cooper Hewitt, Smithsonian Design Museum

Cooper Hewitt, located in New York City, features exhibition content focusing on historical and contemporary design. Its collection is international in scope and encompasses 215,000 objects, representing 30 centuries of design. Federal funding supports 35 percent of Cooper Hewitt’s operating budget, while the remaining 65 percent comes from general trust funds and donor or sponsor designated funds.

From November 2, 2024 through August 10, 2025, Cooper Hewitt exhibited the *Making Home*, a cohort of 25 commissioned installations to explore the multifaceted nature of home across the United States, US territories, and Tribal Nations through the lens of design. The exhibition had a physical presence throughout Cooper Hewitt’s museum, was available digitally on Cooper Hewitt’s website, and was featured in an accompanying book of essays and visuals titled *Making Home: Belonging, Memory, and Utopia in the 21st Century*.

Planning and development for *Making Home* spanned more than 4 years and included solicitation of artist proposals for exhibit content. The development of the installation that became *Patterns of Life* began in June 2023 when Cooper Hewitt received the artist’s initial untitled proposal for a series of large-scale dioramas exploring how physical structures that we call “home” affect our lives. Over several months, the artist submitted revised proposals with varying focuses on the concept of home. By early 2024, the concept had evolved into *Patterns of Life*, architectural models of homes destroyed by US-manufactured weapons during airstrikes in Iraq (2015), Syria (2016), and Palestine (2023), accompanied by panoramic landscape illustrations. Figures 1 and 2 illustrate areas of the final installation.

Figure 1. *Patterns of Life* as Displayed at Cooper Hewitt, Smithsonian Design Museum



Image Credit: Cooper Hewitt, Smithsonian Design Museum

Figure 2. *Patterns of Life* as Displayed at Cooper Hewitt, Smithsonian Design Museum



Image Credit: Cooper Hewitt, Smithsonian Design Museum

Of the 25 installations, *Patterns of Life* garnered significant negative public attention with more than 2,600 complaints sent to the Smithsonian through an email campaign. The installation was intended to portray examples of “domicide”—the widespread and systematic destruction of housing due to military conflict, urban development, or social upheaval. In particular, the purpose was to highlight the complex roles of the United States as the world’s largest producer of arms while also being the leading financial contributor to United Nations peacekeeping initiatives. However, complaints alleged that the museum provided a national platform for anti-American and anti-Israeli political activism and that the exhibit lacked balance and omitted context.

RESULTS OF EVALUATION

OIG determined that Cooper Hewitt generally followed the content review process for the *Patterns of Life* exhibit. Specifically, Cooper Hewitt appropriately notified the Under Secretary for Museums and Culture of sensitive issues in the exhibit and presented material before the SD 603 Committee for review. However, the SD 603 Committee functions informally without defined authority and procedures to review content and make recommendations. The unclear committee roles and responsibilities were evident during the review of *Patterns of Life* and will pose challenges for all other exhibits with sensitive content.

OIG also determined, that although the Smithsonian has taken steps to strengthen the content review process through revisions to SD 603, training, and resources, additional improvements would enhance the process. Such improvements include clarifying expectations around (1) content review timing and documentation, (2) formal unit exhibition planning guidelines, (3) obtaining diverse perspectives, and (4) contracts for exhibition content.

In addition, while reviewing documentation on the development of *Patterns of Life*, OIG examined proposals for federal funds and identified \$36,500 in questioned costs. Specifically, Cooper Hewitt used federal funds designated for American women's history initiatives without notifying fund administrators that the exhibit no longer had the connection to American women's history as initially proposed.

Cooper Hewitt Generally Followed the Content Review Process for *Patterns of Life*

Consistent with unit responsibilities outlined in SD 603, in August 2023, Cooper Hewitt initiated the content review process for the Triennial by identifying seven installations with content of a sensitive nature and meeting with the USMC. The USMC determined the exhibition should undergo a formal content review by the SD 603 Committee, an informal body consisting of senior officials across the Smithsonian.⁴ The installation that became *Patterns of Life* was not identified during this early planning phase because the artist had proposed a different concept at the time, *A Street In A Room* – the story of ten New York City buildings, squeezed down into one New York room. By January 2024, *A Street In A Room* had evolved into *Patterns of Life* and was added to the discussion of sensitive content.

Prior to the Triennial opening, Cooper Hewitt met with the SD 603 Committee twice and included *Patterns of Life* on both occasions. In February 2024, Cooper Hewitt presented the content for *Patterns of Life* and seven other installations to the SD 603 Committee. Based on Cooper Hewitt's meeting summary, the committee asked how curators work with commissioned artists, how the Triennial will be advertised if there is content deemed not appropriate for children, and how Cooper Hewitt is incorporating the points of view of others who might disagree with content. The summary noted that one committee member specifically mentioned

⁴ Appendix IV lists SD 603 Committee members as provided to OIG.

that *Patterns of Life* would require follow-up but did not include details about that follow-up. In June 2024, Cooper Hewitt again met with the SD 603 Committee regarding the installations, as content was more fully developed. However, Cooper Hewitt did not document what was discussed or recommended in this second meeting despite SD 603 requiring unit directors provide the USMC with a summary of the formal review and ensure that all recommendations and/or action items were addressed.

In September 2024, Cooper Hewitt delivered the label text for the eight installations to the USMC for review by the SD 603 Committee. The committee expressed concerns about the focus on US-manufactured weapons, and as a result, Cooper Hewitt revised a portion of the label text to reflect the simultaneous roles the United States holds as the leading financial contributor to United Nations peacekeeping initiatives and as the world's largest producer of arms. In October 2024, the USMC approved the label text for the eight installations, including *Patterns of Life*. On November 2, 2024, Cooper Hewitt opened the Triennial exhibition to the public. See Appendix III for the timeline of Cooper Hewitt's Triennial Exhibition Development process.

Figure 3. Cooper Hewitt Trigger Warning



Image Credit: OIG photo

the trigger warning, as shown in Figure 3, appears to be a general statement that views expressed by artists and designers are their own. Further, due to its size, the OIG had difficulty locating the small placard but eventually found it near the entrance to the museum, one floor below the exhibit. By July 2025, an organized email campaign resulted in more than 2,600 complaints. The exhibit closed as originally planned on August 10, 2025.

In February 2025, the Director of Cooper Hewitt elevated to the USMC and central Smithsonian management a visitor complaint that *Patterns of Life* presented a bias against America and Israel and editorially omitted context, complexity, and sensitivity to multiple viewpoints. The USMC, in coordination with Cooper Hewitt and other central Smithsonian offices, determined that adding a trigger warning for the exhibit would be an appropriate response to the visitor's concerns.

However, OIG's visit to Cooper Hewitt found that

Overall, the USMC said Cooper Hewitt and the *Patterns of Life* installation did not violate SD 603. However, the USMC said the SD 603 Committee should have required that Cooper Hewitt spend time consulting with others who have different points of view about the war in Gaza. Further, the USMC said that the SD 603 Committee could have asked for the inclusion of a warning in its review.

The SD 603 Committee's Authority, Role, and Procedures for Reviewing Sensitive Content Has Not Been Formalized

Despite its role in reviewing sensitive exhibit content, the SD 603 Committee is not formally named or structured within SD 603, and its purpose, responsibilities, and authority are not defined. The committee also lacks procedures describing how reviews should be conducted and resources to support the review process. As a result, committee members and units are

uncertain of their roles and responsibilities and how to effectively review content. Standards for Internal Control in the Federal Government clearly delineate the importance of establishing organizational structure, assigning responsibility, and documenting controls to achieve objectives.

Lack of Committee Structure and Processes

The SD 603 Committee was informally created in the late 1990s and has become more formal over time. However, there is no established organizational structure, charter, or membership. Smithsonian officials serving on the committee do so as an ancillary duty and none of those interviewed by OIG received any specialized onboarding training or resources as new committee members beyond reading SD 603. For example, one committee member said that they did not understand the review committee process and while they read SD 603, there was no onboarding process. Rather, they learned by attending the committee meetings and by watching the USMC. Committee members stated that more formal onboarding to the committee would be helpful.

The informal nature of the committee has led to a lack of defined procedures and expectations for members and the Smithsonian personnel involved in content development. One committee member said that units do not know what the committee is actually looking for, which results in presentations that are difficult to follow and not focused on what the committee needs to know to make decisions. From the unit perspective, a Cooper Hewitt official who has gone through multiple committee reviews over the last several years said there has not been much consistency—the materials requested by the committee and the timing have varied greatly.

Mandatory versus Advisory

Without clearly articulated authority and roles, one area of confusion for both units and committee members is whether committee recommendations are mandatory or advisory. For example, one Cooper Hewitt official said it feels as though there are times when the committee feedback seems advisory and is left to the unit to decide; however, there are times when the committee makes clear decisions requiring unit action. From the committee's perspective, one member asserted that the recommendations are more advisory in nature and that the committee does not have the influence it should have. Further, it is unclear whether the role of the committee is to provide direction to units regarding the type of content that the Smithsonian should develop or to provide guidance on risk management in preparation for public feedback. For example, a Cooper Hewitt official said the Smithsonian could better define the purpose of the committee: Is it for staff to feel supported, or is it a decision-making group to give staff a green light on content? From the committee's perspective, one member was not sure they should necessarily have veto power but noted that there have been instances in which senior Smithsonian officials have expressed concerns over content. Another member mentioned that initially the ethos of SD 603 was that the committee could not tell units to change their exhibits. Rather, the committee was there to raise issues for unit consideration and help units think through how to deal with issues that have been identified.

Several officials also noted that the committee does not meet regularly outside of content reviews. Specifically, one committee member noted that the committee has not had the chance to talk about what it thinks is sensitive, politicized, and controversial, as well as what the Smithsonian's tolerance is in those areas. Instead, the committee has had to think about the difficult challenges of how the Smithsonian is trying to represent the content, the communities that the content represents, and the Smithsonian's best interest in real time.

Limited Documentation of Committee Meetings and Recommendations

According to committee members, unit officials, and file reviews, OIG determined meeting minutes are not taken for SD 603 Committee reviews. SD 603 requires unit directors to provide the USMC with a summary of the formal review and ensure that all recommendations and/or action items are carried out. However, the SD 603 Committee did not consistently enforce this documentation or verify how units addressed recommendations. One committee member noted the risks this imposes when units only document what they want to remember and include in the summary. Further, the SD 603 Committee did not have any formal review of these summaries to ensure complete and accurate documentation and, more importantly, that units implemented the committee's guidance.

Documentation issues were present in the content review of *Patterns of Life* and the other seven *Making Home* installations reviewed by the SD 603 Committee. In this case, Cooper Hewitt officials produced a summary memo after their meeting with the SD 603 Committee in February 2024, but did not draft a summary after the second meeting held in June 2024. Cooper Hewitt indicated a summary was not requested at the conclusion of the second meeting and the USMC responded that it may not have been communicated effectively that the committee expected a memo. As a result, there is no documentation of what was discussed or specifically recommended during that second meeting. The USMC told OIG that the Smithsonian intends to adopt a practice of providing units with committee approval of the unit's changes and highlighting unaddressed recommendations. Until addressed, it will take someone walking through an exhibition to verify that committee recommendations have been implemented.

Timeframes for Review of Content Material and Committee Meeting Discussions are Inadequate

Several SD 603 Committee members expressed the need for adequate time to conduct committee meetings and review content material. Specifically, the committee met for 1 hour about once a month, but members stated that this was insufficient time for unit presentations and debriefing as a committee. In one such example, multiple Cooper Hewitt curators presented the content for eight installations, including *Patterns of Life*, which addressed sensitive subject matter such as armed conflict, slavery, and reproductive health. Further, committee members noted that often the committee does not have enough time for robust debriefings following unit presentations. Committee members suggested that the committee hold an executive session that includes the unit directors only, so that members may have an open discussion about the content without the curators present.

Additionally, content materials were often presented either (1) too early in an exhibit's development, resulting in only preliminary reviews of sensitive content, or (2) too late, resulting in rushed reviews and recommendations. *Patterns of Life* demonstrates the decreased effectiveness of reviews that occur too early in content development and the increased pressure late reviews place on both committee members and unit personnel. For example, the February 2024 meeting did not include label text, talking points, onsite signage, or data visualizations which require review by the committee. The exhibit's final text labels were sent for committee review two months before the exhibit's November opening. According to several committee members, determining the appropriate timing of content reviews is a challenging issue because the timing is unique to each exhibit and its sensitivity. Therefore, adequate timing should be determined based on each exhibit type.

According to committee members, the timing of committee reviews is challenged further when exhibits have accompanying publications. The production schedules for publications start further in advance of the exhibition opening and committee members do not have time to read every word of the publication before meeting. Therefore, the committee is trying to determine the appropriate level of review for publications going forward. This challenge was highlighted in OIG's review of *Patterns of Life* as Cooper Hewitt published an accompanying book of essays and visuals titled *Making Home: Belonging, Memory, and Utopia in the 21st Century*. Cooper Hewitt asked whether the book should undergo the SD 603 content review process but was instructed that the book did not require SD 603 review even though its content mirrored and expanded on the sensitive concepts presented in the exhibit.

Smithsonian Has Taken Steps to Strengthen the Content Review Process, but Improvements Are Needed to Clarify Requirements and Expectations

Since the revision of SD 603, the Smithsonian has made progress in addressing process and procedure gaps related to sensitive content. For example, the revised policy strengthened language particularly related to content and consultations. In addition, the Smithsonian developed a learning series and resources focused on content review for all staff. However, OIG determined that additional improvements would further enhance the Smithsonian's efforts. Such improvements include clarifying expectations around (1) content review timing and documentation, (2) formal unit exhibition planning guidelines, (3) obtaining diverse perspectives, and (4) contracts for exhibition content.

Smithsonian Developed Staff Training and Resources but More is Needed to Prepare Staff for Content Reviews

When *Patterns of Life* was in development, the Smithsonian did not offer comprehensive SD 603 training for personnel who were responsible for navigating the Smithsonian content review process. OIG interviewed Cooper Hewitt personnel who stated it would have been helpful to have training, as it was challenging to go through the content review without an understanding of the process or a document outlining the steps within the process. Similarly, the USMC told OIG that Smithsonian management realized that a number of Smithsonian personnel, including

directors, did not understand that they had obligations under SD 603 and that the policy applied to their content. The USMC said that there seemed to be a lack of uniform awareness that the Smithsonian had specific standards around content.

In September 2025, following the revision of SD 603, Smithsonian management launched an on-going professional learning series for all Smithsonian personnel, covering:

- the protection of the public trust;
- an overview of SD 603 and its implementation; unit-level SD 603 roles and responsibilities; and
- the community of practice for Smithsonian content review, including information sharing between unit directors who have experience going before the SD 603 Committee.

See Figure 4 for a schedule of the learning series. OIG recognizes the content review training is in development as of this report but noted that available training does not currently track attendance or identify roles in need of future training.

Figure 4. Smithsonian Content Review Training Schedule

Upholding the Smithsonian Standard with Secretary Bunch – Completed September 2025

Theory of Change around Public Trust (Public Perception and Trust in the Smithsonian) – Completed September 2025

Understanding the Core Principles of SD 603 – Released January 2026

SD 603 Scholarly Rigor, Best Practices, and Audience – Launched January 2026

Brown Bag Series: Shared Understanding of the SD 603 Content Review Process – Launched March 2026

Unit Policies, Planning, Roles and Responsibilities with Supervisors and Unit Directors – Summer 2026

Pan-Institutional Conversation about Navigating Sensitive Issues – Fall 2026

Source: OIG-generated based on information provided by the Under Secretary for Education

Further, in January 2026, the Smithsonian launched an intranet webpage containing Smithsonian content planning and review practices, along with SD 603 guidance, templates, and examples. While the Smithsonian has drafted an SD 603 worksheet to establish consistent presentation of content to the SD 603 Committee, the timing has not been clarified, nor has the expectation that the resulting conversations be documented and implemented.

Training and resources on this complex and extensive process are important to help ensure the consistent application of the SD 603 content review process and prepare the Smithsonian for the public’s reaction to sensitive content. Without sufficient training and resources, there may be knowledge gaps regarding the process, roles and responsibilities, presentation of content to the committee, and the Smithsonian consensus on sensitive, controversial, or politicized content.

Formal Unit Exhibition Planning Guidelines Are Not Enforced

Cooper Hewitt did not establish formal unit guidelines for exhibition planning that aligned with SD 603 requirements. Further, Smithsonian leadership did not enforce this requirement or review unit guidelines regularly. Cooper Hewitt and multiple SD 603 Committee members expressed the belief that formal unit guidelines were not required prior to the June 2025 revision of SD 603. However, OIG determined the October 2021 version of SD 603 contained the requirement for formal unit guidelines.

Instead of formal unit guidelines, Cooper Hewitt relied on internal exhibition planning and development tools, such as an exhibition's workflow diagram and a detailed activity timeline. The workflow diagram and activity timeline outlined the exhibition planning process but were not robust substitutes for formal unit guidelines because they did not:

- Document the unit procedures carried out within each phase of content development;
- Outline the SD 603 content review procedures the unit will follow once the determination has been made to proceed with formal content review; and
- Establish mechanisms to identify sensitive issues and operational risks in content before they arise.

SD 603 authorizes the USMC and Secretarial Direct Reports to review formal unit guidelines established for SD 603 content review. However, the USMC and Secretarial Direct Reports did not exercise this authority because (1) they did not enforce the establishment of required formal unit guidelines and (2) periodic review of the unit guidelines is authorized but not required by SD 603. Review of guidelines at the Under Secretary level can provide a more clear and unified understanding of the Smithsonian's expectations regarding content review across the institution.

Formal written guidelines increase transparency and a common understanding of the content review process at the unit level. During the evaluation, the Under Secretary for Education, leading the development of the SD 603 learning series, mentioned that the Smithsonian intends to emphasize the development of unit-level guidelines during an upcoming training to provide guidance, formats, and templates. However, this emphasis does not ensure that units will develop and implement formal guidelines.

Revised SD 603 Requires Units to Obtain Diverse Perspectives but Does Not Provide Related Implementation Guidance

The Smithsonian strengthened language in the revised SD 603 for units to obtain a balance of perspectives in content development from ad-hoc advisory groups, colleagues with content expertise, and potential audience members. For example, language changed as follows (**new language is in bold and deleted language is struck through**):

Staff are encouraged to **shall** consult a **broad range of** potential audience members **reflecting diverse perspectives** in the project's planning and design stages (e.g., via visitor studies or focus groups), as appropriate.

However, SD 603 does not include guidance regarding how units should examine, consider, and account for the perspectives obtained; what it means to have a reasonable balance of perspectives; and how units can actually achieve the balance in their content in accordance with Smithsonian expectations. Further, SD 603 suggests units re-evaluate the appropriateness of changes in direction or in degree of emphasis or balance but does not require units to re-evaluate or obtain additional consultation for these significant changes.

As a case in point, the challenges in obtaining diverse perspectives were present in *Patterns of Life*. Cooper Hewitt obtained an external audience study for the Triennial in April 2022, well before the initial content development and identification of artists. During the development of *Patterns of Life*, Cooper Hewitt consulted with external parties with expertise in military arms and affairs, redress for survivors of US airstrikes, and reporting across the Middle East, with the perception that these external parties achieved a balance of perspectives. However, many members of the public did not feel the exhibit was balanced. The Smithsonian received more than 2,600 complaints about *Patterns of Life*, specifically alleging the exhibit was an “anti-American and anti-Israel narrative presenting one-sided activism as fact”.

In response, Cooper Hewitt agreed that bridging the gap in gathering other perspectives is challenging during exhibition planning. Several SD 603 Committee members also acknowledged that units are still confused about the Smithsonian’s intentions for a balance of perspectives and hoped that the ongoing professional learning series would build a community of practice, enhancing the pan-institutional understanding of this requirement. Without further guidance, units risk spending time and resources fulfilling the requirement for consultations without ultimately achieving a reasonable balance of perspectives in their content.

Guidance on Contractual Language for User-Generated Exhibition Content is Limited

SD 603 does not require contractual language protecting the Smithsonian's final say for all content, including commission-based content. Further, SD 603 does not stipulate the timeframe at which contracts are to be executed to align with the content review process. While SD 603 does require that any user-generated exhibition content, produced by organizations or individuals, is governed by the Smithsonian Terms of Use, it does not define the terms or reference the source guidance. Although the *Patterns of Life* exhibition agreements included language protecting the Smithsonian’s final autonomy over displaying content, the Smithsonian is not certain that all agreements for commissioned content include this language.

For *Patterns of Life*, Cooper Hewitt executed the exhibition development agreement with the participating research firm 11 days after the exhibition opened and with the artist 5 months after the exhibition closed.⁵ However, this is not considered typical. Smithsonian units will often

⁵ The Director of Cooper Hewitt stated that the delayed contract was due to a change in name of the company the artist was paid through.

execute agreements with artists before the sensitive, controversial, or politicized content is subjected to review by the SD 603 Committee. The USMC said they have been talking to Smithsonian’s contracting office about how to ensure content has been subjected to review by the SD 603 committee before the contracts are approved—an action that would enhance Smithsonian’s authority over content decisions.

OIG Questions \$36,500 in American Women’s History Initiative Pool Funds Used for *Patterns of Life*

In reviewing documentation on the development of *Patterns of Life*, OIG examined proposals for federal funds and identified \$36,500 in questioned costs. Specifically, Cooper Hewitt used funds from the American Women’s History Initiative Pool (AWHIP) for the *Patterns of Life* exhibit.⁶ AWHIP fund guidelines require that awarded projects must further AWHIP’s mission to research, share, and amplify the histories of American women. Cooper Hewitt’s initial proposal indicated that *Making Home* would expand the story of the American home through women’s often-untold accounts and accomplishments.

Figure 5. A Street In A Room Concept in July 2023



Source: Cooper Hewitt, Smithsonian Design Museum

The proposal also stated that the *Patterns of Life* artist would recreate a street that encompassed the most iconic home designs in the US over the past 100 years, see Figure 5 for the initial *A Street In A Room* concept. SD 603 states Smithsonian staff raising funds

for exhibitions should consult regularly with their unit director to ensure that conflicts do not arise between the expectations of supporters and those of staff involved in developing exhibitions content. However, Cooper Hewitt did not notify AWHIP administrators upon changing the exhibit’s concept from “exploring how physical structures that we call “home” affect our lives through a recreation of a street that encompasses some of the most iconic home designs to have appeared in the US over the past 100 years” to non-US homes destroyed by US weapons. Further, the Director of Cooper Hewitt stated they believed the change was minor and would not warrant notification to AWHIP administrators.

AWHIP administrators expressed concerns over not being notified of the change and by how significantly the concept had changed from what was included in Cooper Hewitt’s proposal. As a result, OIG raises Cooper Hewitt’s use of the \$36,500 in AWHIP federal funds for *Patterns of Life* as a questioned cost.

⁶ AWHIP is one of the centrally managed award programs at the Smithsonian. AWHIP receives annual proposals from units and a review panel, along with Smithsonian management, directs these federal funds to projects that demonstrate the greatest public impact and enhance the inclusion of women’s stories as fundamental to the American story.

CONCLUSIONS

Content review processes play a vital role in ensuring the integrity of the Smithsonian's exhibitions and related activities. The *Patterns of Life* exhibit demonstrated challenges units can encounter within the content review process, particularly when sensitive and subjective matters are present in the exhibits. While processes may benefit from some degree of agility, OIG identified several opportunities to improve the effectiveness of content reviews. As the Smithsonian continues to evolve and takes actions to strengthen its content review process, particular attention to refining committee structure, establishing procedures, and clarifying policies will advance its efforts.

RECOMMENDATIONS

OIG recommends the Under Secretary for Museums and Culture take the following steps:

1. Update SD 603 to:
 - a. Outline the role and authority of the SD 603 Committee.
 - b. Reference available training and related resources on the SD 603 content review process.
2. Establish SD 603 Committee internal procedures for onboarding committee members, conducting content reviews, documenting committee review meetings, and following up on recommendations.
3. Require periodic training for Smithsonian personnel involved in content development and track completion of the training.
4. Develop and implement a process for reviewing and providing feedback on formal unit content planning guidelines required under SD 603.
5. Develop and implement formal written guidance for units better defining and clarifying:
 - a. How to achieve a balance of perspectives.
 - b. How to document differing perspectives acquired during required consultations.
 - c. How to re-evaluate or obtain additional consultation for changes in content direction or in degree of emphasis.
 - d. The timing of content review for commissioned work and publications prior to contract execution.

OIG recommends the Director of Cooper Hewitt take the following steps:

6. Develop and implement formal unit content planning guidelines adhering to the provisions of SD 603.

OIG recommends the Director of Cooper Hewitt, in coordination with the administrator of AWHIP funding, take the following steps:

7. Determine and document the allowability of the questioned \$36,500 cost funded with AWHIP federal funds, and resolve any costs determined to be disallowed with the AWHIP administrators.

MANAGEMENT COMMENTS AND OIG RESPONSE

OIG provided management a draft of this report for review and comment, and management provided written comments that are reproduced in its entirety in Appendix V. In its comments, management concurred with six of the seven recommendations and outlined actions taken and planned to address them. OIG evaluated management's comments and will verify whether the actions meet the intent of the recommendations.

Management did not concur with Recommendation 3 to require and track completion of periodic training for Smithsonian personnel involved in content development. While management acknowledged that such training is necessary to uphold the Smithsonian's standards for content review, it is concerned that requiring such training for all staff across the diverse job classifications involved in content development presents significant administrative and logistical challenges. However, OIG considers a targeted approach essential to help ensure that the Smithsonian maintains consistency and rigor in applying SD 603—particularly regarding sensitive, controversial, or politicized content.

Objective, Scope, and Methodology

The objectives of this evaluation were to (1) determine the extent to which Cooper Hewitt followed the Smithsonian Institution's content review policy when developing the *Patterns of Life* exhibit and (2) identify opportunities to strengthen the content review process.

The Office of the Inspector General (OIG) selected the *Patterns of Life* exhibit within Cooper Hewitt's *Making Home-Smithsonian Design Triennial* as a case study of the Smithsonian's content review process. The evaluation focused on policies and procedures in effect from the inception of the exhibit planning for *Patterns of Life* through May 2026.

To accomplish the first objective, OIG reviewed Smithsonian Directive (SD) 603, *Exhibition, Program Planning, Research, and Educational Content* (October 2021), in effect during the planning and development of *Patterns of Life*, to identify requirements for exhibit content review. To assess Cooper Hewitt's compliance with the SD 603 content review requirements, OIG reviewed documentation related to Cooper Hewitt's content development and review procedures, proposals for the commissioned exhibit, the SD 603 Committee review, and communication between Cooper Hewitt and Smithsonian officials. Additionally, OIG interviewed Cooper Hewitt personnel involved in the content development and review of *Patterns of Life*, as well as SD 603 Committee members responsible for reviewing the content.

To accomplish the second objective, OIG assessed changes the Smithsonian made to its content review policies and practices. OIG compared the SD 603 effective October 2021 to the revised SD 603 effective June 2025 to identify changes to exhibit content review procedures. OIG determined whether any issues identified in the content review process for *Patterns of Life* remained unresolved by the revised policy. OIG reviewed training materials, templates, and other documentation related to Smithsonian efforts to increase understanding and implementation of the content review process. Further, OIG interviewed Cooper Hewitt and Smithsonian officials regarding opportunities to strengthen the content review process.

OIG conducted the evaluation in Washington, DC, and New York City from July 2025 through May 2026, in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

Appendix II

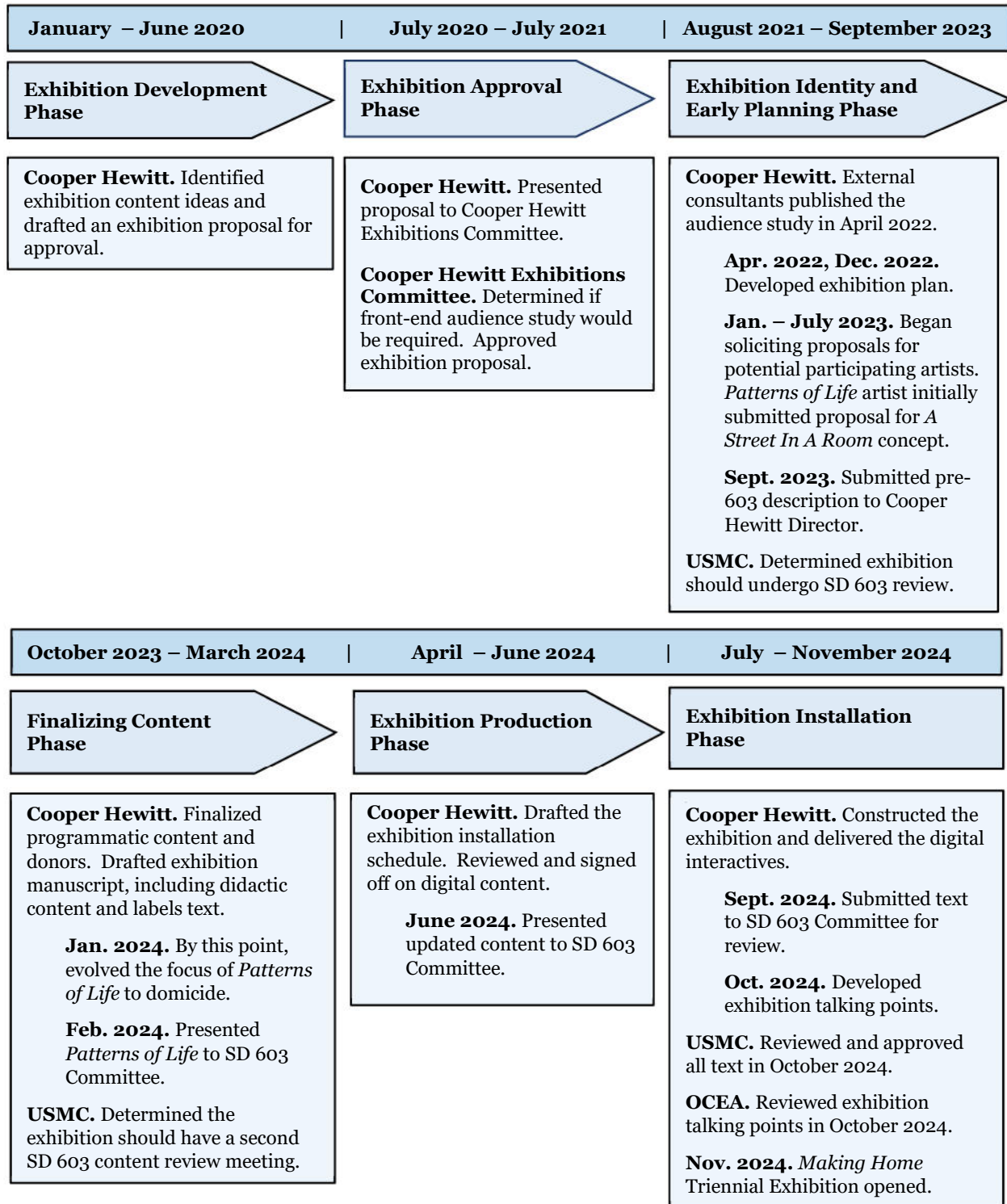
Key Updates to Smithsonian Directive 603 in June 2025

October 2021 SD 603	June 2025 SD 603 Key Updates
Definitions	
<p>Defines a <i>sensitive issue</i> as “issue about which stakeholders and/or public may disagree on substantive ground with the presentation of contents of an exhibition, public program, research activity, and educational content.”</p>	<p>Addition. “This may also include partisan battles on particular topics and/or the potential for reasonable viewers to find the content offensive.”</p> <p>Revision. Also, sensitive issue has been expanded to include controversial or politicized.</p>
Roles	
<p>The Under Secretary for Museums and Culture (“USMC”) is responsible for convening formal and informal reviews of exhibits, public programs, research, and educational content when sensitive issues or risks are identified.</p>	<p>Addition. In such reviews, the USMC (or other Smithsonian official authorized to convene such reviews) exercises the Secretary’s authority to approve, disapprove, or require changes to any Smithsonian content.</p>
Exhibition, Public Programs, Research, and Educational Content	
<p>Should be grounded in scholarly knowledge, employ accepted educational methods, be well organized, and consider the diverse needs and sensibilities of visitors, audiences, and participants.</p>	<p>Revision. Must be grounded in scholarly knowledge, reflect a balance of perspectives, employ accepted educational methods, be well organized, consider the diverse needs and sensibilities of visitors, audiences, and participants, and be nonpartisan.</p>
<p><i>Not included.</i></p>	<p>New. Must be appropriate for general and broad audiences served by the Smithsonian, use plain language, and not contain academic jargon.</p>
Consultation	
<p>Staff are encouraged to consult with colleagues or directors of other Smithsonian units with special expertise in a relevant content area early in the planning process.</p>	<p>Revision. Staff shall consult with colleagues or other Smithsonian unit directors with special expertise in the relevant content area early in the planning process.</p>
<p>Staff are encouraged to consult potential audience members in the project’s planning and design stages (e.g., via visitor studies or focus groups), as appropriate.</p>	<p>Revision. Staff shall consult a broad range of potential audience members reflecting diverse perspectives in the project’s planning and design stages (e.g., via visitor studies or focus groups), as appropriate.</p>
<p>Ad-hoc advisory groups should be considered for major projects and be convened at the earliest possible time.</p>	<p>Revision. One or more ad-hoc advisory groups representing diverse perspectives shall be consulted for major projects and be convened at the earliest possible time.</p>

Source: Compiled by OIG based on the Smithsonian Directive (SD) 603, Exhibition, Program Planning, Research, and Educational Content (Oct 2021) and SD 603, Exhibition, Program Planning, Research, and Educational Content (June 2025)

Appendix III

Cooper Hewitt Triennial Exhibition Development Phases



Source: Compiled by OIG based on the Cooper Hewitt Exhibition Workflow for *Making Home – Smithsonian Design Triennial*.
 Legend: Under Secretary for Museums and Culture (USMC)
 Smithsonian Directive (SD)
 Office of Communications and External Affairs (OCEA)

SD 603 Committee Members

SD 603 Committee	
<ul style="list-style-type: none"> ▪ Under Secretary for Museums and Culture, Chair ▪ Under Secretary for Education ▪ Under Secretary for Science and Research ▪ Under Secretary for Finance and Administration ▪ Chief of Staff to the Secretary ▪ Chief of Staff to the Deputy Secretary and Chief Operating Officer ▪ Counselor and Chief of Staff to the Smithsonian Board of Regents ▪ Chief Legal Officer ▪ Director, Office of Global Affairs 	<ul style="list-style-type: none"> ▪ Director, Office of Government Relations ▪ Assistant Secretary for Communications and External Affairs, Office of Communications and External Affairs (OCEA) ▪ Senior Program Officer for Art, Office of the Under Secretary for Museums and Culture (OUSMC) ▪ Acting Lead Program Officer for Strategy and Organization, OUSMC ▪ Deputy Under Secretary for Special Projects, OUSMC ▪ Head of Digital Transformation ▪ Director, Office of Visitor Accessibility

Source: Compiled by Office of the Inspector General based on the list of committee provided by OUSMC

Management Comments



Smithsonian Institution

Kevin Gover
Under Secretary for Museums and Culture

Date: June 18, 2026
To: Joan Mockeridge, Assistant Inspector General for Audits, Inspections & Evaluations
From: Kevin Gover, Under Secretary for Museums and Culture
Cc: Nicole Angarella, Inspector General
Amy Burns, Deputy Assistant Inspector General
Jorjeana L. Quinn, Auditor, OIG
Maria Nicanor, Director, Cooper Hewitt, Smithsonian Design Museum
Carol LeBlanc, Acting Deputy Secretary & Chief Operating Officer
Craig Blackwell, Chief of Staff to the Deputy Secretary & Chief Operating Officer
Gregory Bettwy, Chief of Staff to the Secretary
Anne Brachman, Director, Office of Government Relations
Stacy Cavanagh, Senior Executive Officer, OUSMC
Monique Chism, Under Secretary for Education
Ron Cortez, Under Secretary for Finance and Administration
Joanne Flores, Senior Program Officer for Art, OUSMC
Amelda Fuller, Acting Director Office of Human Resources
Becky Kobberod, Chief Digital and Innovation Officer
John Lynskey, Deputy Chief Financial Officer and Controller
Julissa Marengo, Assistant Secretary for Communications and External Affairs
Jennifer McIntyre, Chief Legal Officer
Aviva Rosenthal, Director, Office of Global Affairs
Lisa Sasaki, Deputy Under Secretary for Special Projects, OUSMC
Ellen Stofan, Under Secretary for Science and Research
Porter Wilkinson, Counselor and Chief of Staff to the Regents
Beth Ziebarth, Director, Office of Visitor Accessibility

Subject: Management Response to *Evaluation of Cooper Hewitt's Content Review Process for "Patterns of Life" as part of the "Making Home" Exhibit*

Thank you for providing the Office of the Inspector General (OIG) formal draft for the Evaluation of Cooper Hewitt's Content Review Process for "Patterns of Life," part of the "Making Home" exhibition on view in 2024 and 2025. I have reviewed this draft carefully with Maria Nicanor, the team at Cooper Hewitt's Smithsonian Design Museum (CHSDM), the members of the SD 603 Committee, and my supervisor, Acting Deputy Secretary Carol LeBlanc. We appreciate the care with which this report and the recommendations were developed.

Established in 1995, the provisions of Smithsonian Directive 603 reflect the importance of maintaining the reputation of the Smithsonian Institution as a trusted source for the American and global publics we serve. Ensuring that Smithsonian Institution content is produced with scholarly rigor, is relevant to our audiences, and meets our responsibility

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Page 2

to be non-partisan is the goal of the SD 603 process. As the report notes, this process was evaluated by senior management beginning in 2024, resulting in revisions to SD 603 in June 2025 to define further for Smithsonian staff who produce content Smithsonian expectations of thoughtful analysis, management of sensitive issues and operational risks, and accountability. As noted in the report, the Patterns of Life exhibit was reviewed by the SD603 committee prior to the June 2025 update of the SD603 policy. Therefore, the exhibit did not benefit from the enhancements and improvements of the policy.

Smithsonian management has reviewed the recommendations contained in the formal draft. As preface, we note that management review of content at a scholarly institution with a unique relationship to the federal government is a complicated matter. We must meet our obligations of accuracy and relevance to the public we serve as the national museums of the United States. We must do so without discouraging inquiry and the creativity of our scholarly community; to do so risks inhibiting discovery and new insights across the broad range of scientific, cultural, and historical matters that we pursue at the Smithsonian. To meet our goal of relevance, we must address topical subjects with the goal of helping our visitors evaluate and understand these subjects and the world in which they live.

With these goals in mind, the following are our responses to the recommendations in the report.

Recommendation 1

Update SD 603 to:

- a) **Outline the role and authority of the SD 603 Committee.**
- b) **Reference available training and related resources on the SD 603 content review process.**

We concur with this recommendation. We will amend SD 603 to further clarify that the content review process prescribed in Section 5 of SD 603 is conducted by a committee of senior managers designated by the Secretary. The committee first meets with the unit director and the staff working on the project and makes recommendations on the content. The unit then responds in writing to the committee's recommendations. In the event that the unit disagrees with the committee's recommendation and the disagreement cannot be resolved, the Under Secretary for Museums and Culture confers with the Secretary, and the Secretary makes a final determination.

On the matter of training, we note that the Secretary held an all-staff meeting in September 2025 to discuss the changes to SD 603 and the plans for a professional learning series, which commenced in fall of 2025. In addition, a professional learning hub was launched in January 2026 to share with all staff recorded training sessions, resource documents, templates, and case studies to provide additional background and clarify professional expectations to staff who produce content. We also launched a brownbag learning series, webinar meetings, and "role-alike" meetings to discuss questions and

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Page 3

encourage a growing community of practice for curators, educators, researchers, and programmers.

We will continue to conduct quarterly brown-bag sessions to report and discuss meetings of the review committee and other matters relating to SD 603, such as the outcome of this report and the commitments we are making in response. We will refresh the learning hub and publish quarterly reminders to staff of the resources available on the learning hub.

Recommendation 2

Establish SD 603 Committee internal procedures for onboarding committee members, conducting content reviews, documenting committee review meetings, and following up on recommendations.

We concur with this recommendation. While we have adopted certain practices in the time since *Patterns of Life* was reviewed, and following the June 2025 policy update, we acknowledge the need for more specificity about procedures. OUSMC staff established in May 2024 a shared folder for committee members to have ongoing access to unit response memos and materials generated by each meeting. A tracking document/finding aid for this shared folder was initiated in May 2026.

As the report points out, the Under Secretary for Museums and Culture is responsible for implementing management reviews under SD 603. The report also notes that participating in the reviews is not the primary responsibility of any committee member. To this we would add that there have been no members of the staff supporting committee members whose primary responsibility is implementation of SD 603. To address this, the Deputy Secretary has authorized the establishment of a new full-time program coordinator position. The program coordinator will support the committee and the Under Secretary for Museums and Culture in implementing SD 603 and will carry out the follow-up actions needed to ensure unit compliance with SD 603. We intend to fill this position by the end of calendar year 2026.

As for onboarding new committee members, the Under Secretary for Museums and Culture or another member of the committee will meet with any new committee member to orient the new member on the requirements of SD 603 and committee procedures. This practice will start immediately.

Beginning in June 2025, the committee began holding an executive session at the beginning of each review meeting to permit committee members to confer prior to the discussion with unit staff. More recently, we have also added an executive session at the end of each meeting following the discussion with unit staff. To ensure thoroughness, we will extend the length of the monthly committee meetings and add an executive session with the unit director. These measures will begin immediately.

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Page 4

Recommendation 3

Require periodic training for Smithsonian personnel involved in content development and track completion of the training.

We concur with your note that, “Training and resources on this complex and extensive process are important to help ensure the consistent application of the SD 603 content review process...” We agree with the need for ongoing periodic training for staff involved in content development, but for practical reasons, we cannot agree to *required* periodic training. Because there are many job classifications that produce content, and because many staff members within those classifications are not involved in content creation, sorting which staff should be required to attend training and which should not is administratively impractical.

As discussed above, a professional learning hub was launched in January 2026 to share recorded training sessions, resource documents, templates, and case studies to provide background and clarify professional expectations to staff. The Under Secretaries for Education, Science and Research, and Museums and Culture have launched brownbag learning series, webinar meetings, and Role-Alike meetings to discuss questions and encourage a growing community of practice for content review. We will continue to make this training available to all staff. In addition, by the end of 2026, we will add to our orientation for all new employees instruction on the requirements of SD 603. Finally, we will include in the guidelines called for in Recommendation 5 best practices for units to keep SD 603 front of mind for all content producers at the unit.

Recommendation 4

Develop and implement a process for reviewing and providing feedback on formal unit content planning guidelines required under SD 603.

We concur with this recommendation. The Under Secretary for Education is developing a training session in the professional learning series addressing unit guidelines and the roles and responsibilities of unit staff in the implementation of SD 603. The session will address the requirements for formal unit guidelines in developing exhibitions, programs, research, and publications. It will also address unit responsibilities related to the oversight and review of content created by contributors from outside the Institution (guest curators, commissioned artists, etc.).

After the issuance of the June 2025 revisions to SD 603, all units were instructed to amend their existing content development processes or develop new internal guidance addressing compliance with the directive. We believe all units have done so. We will confirm this by collecting all unit policies by the end of July 2026. The policies will be reviewed to ensure that they adequately address the requirements of the directive as discussed in more detail below.

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Page 5

Recommendation 5

Develop and implement formal written guidance for units regarding to better define and clarify:

- a) **How to achieve a balance of perspectives.**
- b) **How to document differing perspectives acquired during required consultations.**
- c) **How to reevaluate or obtain additional consultation for changes in content direction or in degree of emphasis.**
- d) **Timing of content review for commissioned work and publications prior to contract execution.**

We concur with this recommendation. We will stand up a working committee by the end of August 2026 to develop this guidance. The committee will review unit policies on SD 603 and recommend general guidelines that all unit policies must address, based on the working committee's review of unit policies. The working committee will confer with content-producing units as they produce the guidelines. Given the different circumstances of the units and the diverse content that they produce, developing guidelines appropriate to all units will be challenging. We anticipate that the working committee will complete its work and submit its recommendations to management by the end of March 2027. Management will consider the working committee's recommendations and whether this guidance should be contained in revisions to SD 603 or in a separate policy document. We expect to issue the guidance by the end of June 2027.

We note that the Office of Contracting has adopted a standard operating procedure requiring the Office, prior to approving the contract, to inquire as to the timing of content review under SD 603 at the unit and management levels. We also have established two relevant working groups. The first will recommend management policies and best practices in working with living artists to ensure that content meets the requirements of SD 603. The second will catalog the various competitions and awards being conducted and given by the units and recommend policies for ensuring that awardees are properly vetted and the content is reviewed under SD 603.

Recommendation 6 (CHSDM)

Develop and implement formal unit content planning guidelines adhering to the provisions of SD 603.

We concur in this recommendation. CHSDM has expanded its workflow chart to elaborate in greater detail the steps under SD 603 for planning exhibitions, programs, and publications. CHSDM has developed additional SD 603-specific documents to accompany its workflow documentation for upcoming exhibitions. These include long-form descriptions of CHSDM's SD 603 procedures (narrative guidelines), alongside additional worksheets/checklists and forms that document reviews and approvals ("Revised CHSDM Content Planning Guidelines").

By the end of July 2026, CHSDM will submit the Revised CHSDM Content Planning

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Page 6

Guidelines to the Under Secretary for Museums and Culture for approval in accordance with our response to Recommendation 4. Based on feedback from the Under Secretary, CHSDM will adjust these documents as needed. Once final approval is obtained from the Under Secretary, CHSDM will distribute the final CHSDM Content Planning Guidelines to all staff involved in exhibitions, programs, and publications content development, for immediate adoption and implementation. CHSDM will review and update the CHSDM Content Planning Guidelines periodically.

Recommendation 7 (CHSDM)

Determine and document the allowability of the questioned \$36,500 cost funded with AWHIP federal funds and resolve any costs determined to be disallowed with the AWHIP administrators.

We concur with this recommendation. On June 1, 2026, CHSDM contacted the director of the Smithsonian American Women's History Museum (SAWHM), which administers the AWHIP funds. On June 2, CHSDM and SAWHM leadership met. Upon review of the documentation and information provided, SAWHM's acting director determined that the use of AWHIP funds is allowable and confirmed that decision in writing. This documentation has been provided to the Office of the Inspector General.

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